

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY OPERATING PERMIT

Permit No. 737TVP01
Application No. 737

Issue Date: August 4, 2003
Expiration Date: September 3, 2008

The Department of Environmental Conservation, under the authority of AS 46.14 and 18 AAC 50, issues an operating permit to the Permittee, **Yukon-Kuskokwim Health Corporation**, for the operation of the **Yukon-Kuskokwim Delta Regional Hospital**.

This permit satisfies the obligation of the owner and operator to obtain an operating permit as set out in AS 46.14.130(b).

As set out in AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this operating permit.

This Operating Permit becomes effective September 4, 2003.


John F. Kuterbach, Manager
Air Permits Program



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List of Abbreviations Used in this Permit

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AS	Alaska Statutes
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BHp	Boiler Horsepower
C.F.R.	Code of Federal Regulations
CO 	Carbon Monoxide
dscf	Dry standard cubic foot
EPA	US Environmental Protection Agency
gr./dscf	grain per dry standard cubic foot (1 pound = 7000 grains)
GPH	gallons per hour
HAPs or HACs	Hazardous Air Pollutants or Hazardous Air Contaminants [<i>HAPs</i> or <i>HACs</i> as defined in AS 46.14.990(14)]
HMIWI	Hospital Medical Infectious Waste Incineration as defined in 40 CFR 62 Subpart HHH
ID	Source Identification Number
kPa	kiloPascals
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology as defined in 40 C.F.R. 63.
MR&R	Monitoring, Recordkeeping, and Reporting
NESHAPs	Federal National Emission Standards for Hazardous Air Pollutants [<i>NESHAPS</i> as contained in 40 C.F.R. 61 and 63]
NO _x	Nitrogen Oxides
NSPS	Federal New Source Performance Standards [<i>NSPS</i> as contained in 40 C.F.R. 60]
O & M	Operation and Maintenance
O ₂	Oxygen
PM-10	Particulate Matter less than or equal to a nominal ten microns in diameter
ppm	Parts per million
ppmv, ppmvd	Parts per million by volume on a dry basis
psia	Pounds per Square Inch (absolute)
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
SIC	Standard Industrial Classification
SO ₂	Sulfur dioxide
TPH	Tons per hour
TPY	Tons per year
VOC	volatile organic compound [<i>VOC</i> as defined in 18 AAC 50.990(103)]
VOL	volatile organic liquid [<i>VOL</i> as defined in 40 C.F.R. 60.111b, Subpart Kb]
vol%	volume percent
wt%	weight percent

Section 1. Identification

Names and Addresses

Permittee:	Yukon-Kuskokwim Health Corporation Yukon-Kuskokwim Delta Regional Hospital
Facility Name:	Yukon-Kuskokwim Delta Regional Hospital (a.k.a. Bethel Hospital)
Location:	60° 47' North; 161° 47' West
Physical Address:	829 Chief Eddie Hoffman Highway Bethel, Alaska 99559
Owner:	Yukon-Kuskokwim Health Corporation 829 Chief Eddie Hoffman Highway Bethel, Alaska 99559
Operator:	Yukon-Kuskokwim Delta Regional Hospital 829 Chief Eddie Hoffman Highway Bethel, Alaska 99559
Permittee's Responsible Official	Hugh Short, Vice President Support Services Yukon-Kuskokwim Health Corporation
Billing (Fee) Contact:	Christine Christiansen P.O. Box 528 Bethel, Alaska 99559 Phone: (907) 543-6023
Facility Contact:	Dusan Kovac Yukon-Kuskokwim Delta Regional Hospital Phone: (907) 543-6311 <u>Or:</u> Matthew Reardon [mreardon@anthc.org]
Facility Process Description:	General Medical and Surgical Hospital
SIC Code of the Facility:	8062

[18 AAC 50.350(b)(1), 1/18/97]

Section 2. General Emission Information

[18 AAC 50.350(b)(1), 1/18/97]

Emissions of Regulated Air Contaminants, as provided in the Permittee's application:

Lead, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter, VOC's, Oxides of Nitrogen, and Hazardous Air Pollutants (HAPS).

Operating Permit Classifications: AS 46.14.130(b)(4)(A)

Section 3. Source Inventory and Description

[18 AAC 50.350(d)(2), 1/18/97]


Table 1 - Source Inventory

Sources listed in Table 1, in **bold print**, indicate sources that have owner requested limits (ORL's) on their operation. The boilers listed in the table below are provided for informational purposes only, because none of the boilers have air contaminants levels above 100 tpy or more, therefore do not have SIP requirements. All source descriptions and ratings are given for identification purposes only.

ID	Source Name	Source Description	Rating/size	Installation Date
1	Hospital Hot Water Boiler No. 1	Diesel Fuel	33.7 gal/hour water	1979
2	Hospital Hot Water Boiler No. 2	Diesel Fuel	33.7 gal/hour water	1979
3	Hospital Hot Water Boiler No. 3	Diesel Fuel	33.7 gal/hour water	1979
4	Hospital Steam Boiler No. 1	Diesel Fuel	24 gal/hour water	1979
5	Hospital Steam Boiler No. 2	Diesel Fuel	24 gal/hour water	1979
6	Hospital Emergency Generator No. 1	Diesel Fuel	565 kW	1979
7	Hospital Emergency Generator No. 2	Diesel Fuel	565 kW	1979
8	Hospital Emergency Generator No. 3	Diesel Fuel	565 kW	1979
9	Hospital Medical Waste Incinerator	Shenandoah P-25-M1 Waste/Diesel Fuel	2,000 lbs. per week 50 lbs/charge maximum	1995
10	Services Bldg. Hospital Hot Water Boiler No. 1	Diesel Fuel	21.5 gal/hour water	1998
11	Services Bldg. Hospital Hot Water Boiler No. 2	Diesel Fuel	21.5 gal/hour water	1998
12	Services Bldg. Emergency Generator No. 1	Diesel Fuel	600 kW	1998

Section 4. Emission Fees

- 1. Assessable Emissions.** The Permittee shall pay to the Department an annual emission fee based on the facility's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410(b). The Department will assess fees per ton of each air contaminants that the facility emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of

- 1.1 the facility's assessable potential to emit of 90 TPY; or
- 1.2 the facility's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the Department, when demonstrated by
 - a. an enforceable test method described in 18 AAC 50.220;
 - b. material balance calculations; 
 - c. emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
 - d. other methods and calculations approved by the Department.

[18 AAC 50.346(a)(1), 5/3/02 and 18 AAC 50.350(c) & 50.400 – 50.420, 1/18/97]

- 2. Assessable Emission Estimates.** Emission fees will be assessed as follows:

- 2.1 no later than March 31 of each year, the Permittee may submit an estimate of the facility's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or
- 2.2 If no estimate is received on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set forth in condition 1.1.

[18 AAC 50.346(a)(1), 5/3/02 and 18 AAC 50.350(c) & 50.400 – 50.420, 1/18/97]

Section 5. Source-Specific Requirements

Source Subject to Federal New Source Performance Standards and 40 CFR 62 Subpart HHH – Hospitals/Medical/infectious Waste Incinerators

[18 AAC 50.040(a)(1), 8/15/02]
[40 C.F.R. 60.11(d), Subpart A, 7/1/01]

3. **Subpart HHH Modifications.** The Permittee shall be subject to the applicable requirements of 40 CFR 60; Subpart, Ec if a modification, as defined in 40 CFR 62.14490, is performed on Source ID 9 after March 16, 1998. With this modification, the Permittee shall not be subject to 40 CFR 62, Subpart HHH, except as provided in 40 CFR 62.14403(b).

[18 AAC 50.040(g), 8/15/02]
[40 C.F.R. 62.14403 & 14490, Subpart HHH and 40 CFR 60.50c – 60.58c, Subpart Ec; 7/1/01]

4. **Subpart HHH Emission Limits Requirements:** The emission limits and stack opacity requirements of conditions 4.1 and 4.2 apply at all times except during periods of startup, shutdown, or malfunction, provided that no hospital waste or medical/infectious waste is charged to Source ID 9 during periods of startup, shutdown or malfunction.

[18 AAC 50.040(g), 8/15/02 & 50.350(g), 1/18/97]
[40 CFR 62.14413, 7/1/01]

- 4.1 The Permittee shall not exceed the specific emission limits for small rural HMIWIs set out in Table 1 of 40 CFR 62 Subpart HHH.

[40 CFR 62.14411 & Table 1, 7/1/01]

- 4.2 The Permittee shall not cause or allow to discharge into the atmosphere any gases from the stack of Source ID 9 that exhibit 10 percent opacity on a 6-minute block average.

[40 CFR 62.14412, 7/1/01]

5. **Subpart HHH Waste Management Plan.** The Permittee shall comply with the approved waste management plan that meets the requirements of 40 CFR 62.14431.



[18 AAC 50.040(g), 8/15/02 & 50.350(g), 1/18/97]
[40 C.F.R. 62.14431, 7/1/01]

6. **Subpart HHH Operator Training and Qualification.** The Permittee shall ensure that an operator who is fully trained and qualified in accordance with §§ 62.14421(b) or 62.14422 and 62.14423 is at or within 1-hour of the facility.

[18 AAC 50.040(g), 8/15/02]
[40 C.F.R. 62.14420 – 62.14423]

7. **Subpart HHH Documentation.** All documentation listed in § 62.14424(a) and training records must be maintained on site and accessible to all HMIWI operators, and the EPA or the Department upon request during inspection. The Permittee shall review all documentation with the HMIWI operator annually in accordance with § 62.14425.

[18 AAC 50.040(g), 8/15/02 & 50.350(g), 1/18/97]
[40 C.F.R. 62.14424 & 14425, 7/1/01]


8. Subpart HHH Inspection Requirements. The Permittee must ensure that:

- 8.1 Source ID 9 is inspected annually but no more than 12 months following the previous inspection.
- 8.2 At a minimum, the inspection must include all 16 requirements listed in 62.14442(a) through (q).
- 8.3 Any necessary repairs to Source ID 9 must be completed within 10 operating days of the inspection unless prior approval is received from the EPA or DEC.

[18 AAC 50.040(g), 8/15/02 & 50.350(g), 1/18/97]
[40 C.F.R. 62.14441 - 62.14443, 7/1/01]

9. Subpart HHH Performance Testing and Monitoring Requirements. The Permittee shall not cause or allow Source ID 9 to operate above any of the applicable maximum operating parameters, for small rural HMIWI's, and below any of the applicable minimum operating parameters listed in Table 3 of 40 CFR 62, Subpart HHH and measured as 3-hour rolling averages, at all times except during periods of startup, shutdown, malfunction, and performance tests. The Permittee shall:

[18 AAC 50.040(g), 8/15/02 & 50.350(g), 1/18/97]
[40 CFR 62.14450, 14452, 14453 & Table 3, Subpart HHH; 7/1/01]

- 9.1 conduct a performance test upon request by EPA, or the department, at any time;
- 9.2 determine compliance with the opacity limit in condition 4.2 by conducting an annual performance test (no more than 12 months following the previous performance test) using  applicable procedures and test methods listed in 40 CFR 62.14452(g);
- 9.3 establish appropriate maximum and minimum operating parameters for charge rate (once per change) and minimum secondary chamber temperature (continuous) as site specific parameters during initial performance test to determine compliance with the emission limits. Following initial performance test, do not operate outside parameter range except during periods of startup, shutdown, and malfunction;
- 9.4 operation above or below the established parameter range constitutes a violation of the standard, except during periods of startup, shutdown and malfunction or performance tests;

[40 C.F.R. 62.14453, 7/1/01]

[AS 46.14.130 (b)(4), 7/11/02 and 40 C.F.R. 62.14455, 7/1/01]

Section 6. Owner Requested Limits

To avoid classification as a facility that has the potential to emit 100 tpy of a regulated air contaminant.

- 10.** The Permittee shall limit the hours of operation to 1,500 hours per consecutive 12-month period for each Source ID(s) 6 through 8, and 12 listed in Table 1.
- Monitor the operating hours of each source on a monthly basis
 - Maintain records of the monthly and 12-month rolling total hours of operation of each source.
 - Report under condition 20 a summary of the rolling total hours of operation of each Source ID(s) 6 through 8, and 12.
 - Report under condition 19 if the rolling total hours of operation of each Source ID(s) 6 through 8, and 12 exceed the limit in condition 10.

[18 AAC 50.335 (g)(1) and (j)(2), 1/18/97]

To retain federal status as small rural HMIWI for Source ID 9

- 11.** The Permittee shall limit the amount of hospital waste and medical infectious waste incinerated in Source ID 9 to less than 2,000 pounds per week.
- Monitor and record the date, time, and weight of each charge feed to Source ID 9.
 - Report in the facility's semiannual operating report under condition 20 a summary of the total actual amount of hospital waste and medical infectious waste incinerated per week, for each week covered in the reporting period.
 - Report under condition 19 if the amount of hospital waste and medical infectious waste incinerated in Source ID 9 exceeds the limit in condition 11.

[18 AAC 50.335 (g)(1) and (j)(2), 1/18/97]

Section 7. Insignificant Sources

This section contains the requirements that the Permittee identified under (18 AAC 50.335(r)), because the facility has sources that are insignificant, based on actual emissions. This section also specifies the testing, monitoring, recordkeeping, and reporting for insignificant sources that the Department finds necessary to ensure compliance with the applicable requirements. Insignificant sources are not exempted from any air quality control requirement or federally enforceable requirement.

As set out in 18 AAC 50.350(m), the shield of AS 46.14.290 does not apply to these sources.



12. For sources at the facility that are insignificant as defined in 18 AAC 50.335(q)-(v) that are not listed in this permit, the following apply:

12.1 The Permittee shall submit the compliance certifications of condition 21 based on reasonable inquiry;

12.2 The Permittee shall report in the operating report required by condition 20 if a source is insignificant because of actual emissions less than the thresholds of 18 AAC 50.335(r) and actual emissions become greater than any of those thresholds;

12.3 No other monitoring, recordkeeping or reporting is required

[18 AAC 50.346(b)(1), 5/3/02]

Section 8. Generally Applicable Requirements

- 13. Refrigerant Recycling and Disposal.** The Permittee shall comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F.

[18 AAC 50.040(d), 8/15/02 & 50.350(d)(1)(A), 1/18/97]
[40 C.F.R. 82, Subpart F, 7/1/01]

- 14. Permit Renewal.** To renew this permit, the Permittee shall submit an application under 18 AAC 50.335 no sooner than **March 3, 2007** and no later than **March 3, 2008.**

[18 AAC 50.335(a), 1/18/97]

Section 9. General Recordkeeping, Reporting, and Compliance Certification Requirements

- 15. Certification.** The Permittee shall certify all reports, compliance certifications, or other documents submitted to the Department and required under the permit by including the signature of a responsible official for the permitted facility following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Excess emission reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal. When certifying a compliance certification, the official's signature must be notarized.

[18 AAC 50.205 and 50.350(b)(3) & (j), 1/18/97; and 18 AAC 50.345(a) & (j), 5/3/02]

- 16. Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall send two copies of reports, compliance certifications, and other documents required by this permit to ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician. The Permittee may, upon consultation with the Compliance Technician regarding software compatibility, provide electronic copies of data reports, emission source test reports, or other records under a cover letter certified in accordance with condition 15.

[18 AAC 50.350(i), 1/18/97]

- 17. Information Requests.** The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by the permit. The Department may require the Permittee to furnish copies of those records directly to the federal administrator.

[18 AAC 50.200 & 50.350(b)(3), 1/18/97; and 18 AAC 50.345(a) & (i) & 50.350(g) – (i), 5/3/02]

- 18. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:

[18 ACC 50.350(h), 5/3/02]

- 18.1 copies of all reports and certifications submitted pursuant to this section of the permit; and
- 18.2 records of all monitoring required by this permit, and information about the monitoring including:
 - a. calibration and maintenance records, original strip chart or computer-based recordings for continuous monitoring instrumentation;
 - b. sampling dates and times of sampling or measurements;

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- c. the operating conditions that existed at the time of sampling or measurement;
 - d. the date analyses were performed;
 - e. the location where samples were taken;
 - f. the company or entity that performed the sampling and analyses;
 - g. the analytical techniques or methods used in the analyses; and
 - h. the results of the analyses.

19. Excess Emissions and Permit Deviation Reports.

19.1 The Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:

- a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commenced or is discovered, report
 - (i) emissions that present a potential threat to human health or safety; and
 - (ii) excess emissions that the Permittee believes to be unavoidable;
- b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology based emission standard;
- c. report all other excess emissions and permit deviations
 - (i) within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in conditions 19.1c(ii); and
 - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides written permission to report under condition 19.1c(i).

19.2 When reporting excess emissions, the Permittee must report using either the Department's on-line form, which can be found at <http://www.state.ak.us/dec/dawq/aqm/eeform.pdf>, or if the Permittee prefers, the form contained in Section 11 of this permit. The Permittee must provide all information called for by the form that is used.

19.3 When reporting a permit deviation, the Permittee must report using either the Department's on-line form, which can be found at <http://www.state.ak.us/dec/dawq/aqm/eeform.pdf>, or if the Permittee prefers, the form contained in Section 11 of this permit. The Permittee must provide all information called for by the form.

19.4 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

[18 AAC 50.235(a)(2), 50.240(c)-(g), & 50.350(i), 1/18/97; and 18 AAC 50.346(a)(3), 5/3/02]

20. Operating Reports. During the life of this permit, the Permittee shall submit to the Department one original and one copy of an operating report by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year.

20.1 The operating report must include all information required to be in operating reports by other conditions of this permit.

20.2 If excess emissions or permit deviations that occurred during the reporting period are not reported under condition 20.1, either

a. The Permittee shall identify

- (i) the date of the deviation;
- (ii) the equipment involved;
- (iii) the permit condition affected;
- (iv) a description of the excess emissions or permit deviation; and
- (v) any corrective action or preventive measures taken and the date of such actions; or

b. When excess emissions or permit deviations have already been reported under condition 19 the Permittee may cite the date or dates of those reports.

21. Annual Compliance Certification. Each year by March 31, the Permittee shall compile and submit to the Department one original and one copy of an annual compliance certification report as follows:

[18 AAC 50.350(j), 1/18/97]

21.1 For each permit term and condition set forth in Section 4 through Section 9, including terms and conditions for monitoring, reporting, and recordkeeping:

[18 AAC 50.350(d)(4), 6/21/98]

a. certify the compliance status over the preceding calendar year consistent with the monitoring required by this permit;

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- b. state whether compliance is intermittent or continuous;
 - c. briefly describe each method used to determine the compliance status; and
 - d. notarize the responsible official's signature.

[18 AAC 50.205, 1/18/97 & 50.345(a) & (j), 5/3/02]

- 21.2 In addition, submit a copy of the report directly to the EPA-Region 10, Office of Air Quality, M/S OAQ-107, 1200 Sixth Avenue, Seattle, WA 98101.

[18 AAC 50.350(j), 1/18/97]

Section 10. Standard Conditions Not Otherwise Included in the Permit

- 22.** The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those terms or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for:
- 22.1 an enforcement action;
 - 22.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or
 - 22.3 denial of an operating-permit renewal application.
[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (c), 5/3/02]
- 23.** It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.
[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (d), 5/3/02]
- 24.** Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.
[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (e), 5/3/02]
- 25.** Compliance with permit terms and conditions is considered to be compliance with those requirements that are
- 25.1 included and specifically identified in the permit; or
 - 25.2 determined in writing in the permit to be inapplicable.
[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (b), 5/3/02]
- 26.** The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (f), 5/3/02]
- 27.** The permit does not convey any property rights of any sort, nor any exclusive privilege.
[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (g), 5/3/02]
- 28.** The Permittee shall allow the Department or an inspector authorized by the Department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to
- 28.1 enter upon the premises where a source subject to the permit is located or where records required by the permit are kept;

-
- 28.2 have access to and copy any records required by the permit;
 - 28.3 inspect any facility, equipment, practices, or operations regulated by or referenced in the permit; and
 - 28.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (h), 5/3/02]

Section 11. ADEC Notification Form

Fax this form to: (907) 269-7508 Telephone: (907) 269-8888

Yukon-Kuskokwim Health Corporation

Company Name

Yukon-Kuskokwim Delta Regional Hospital

Facility Name

Reason for notification:

☐ **Excess Emissions**

If you checked this box

Fill out section 1

☐ **Other Deviation from Permit Condition**

If you checked this box

fill out section 2

When did you discover the Excess Emissions or Other Deviation:

Date: __/__/__ Time:__:__

Section 1. Excess Emissions**(a) Event Information (Use 24-hour clock):**

	START Time: (hr:min):	END Time:	Duration
Date: _____	_____:	_____:	_____:
Date: _____	_____:	_____:	_____:
		Total:	_____:

(b) Cause of Event (Check all that apply):

<input type="checkbox"/> START UP	<input type="checkbox"/> UPSET CONDITION	<input type="checkbox"/> CONTROL EQUIPMENT
<input type="checkbox"/> SHUT DOWN	<input type="checkbox"/> SCHEDULED MAINTENANCE	<input type="checkbox"/> OTHER _____

Attach a detailed description of what happened, including the parameters or operating conditions exceeded.

(c) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____

(d) Emission Limit Potentially Exceeded

Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.

Permit Condition	Limit	Emissions Observed
_____	_____	_____
_____	_____	_____

(e) Excess Emission Reduction:

Attach a description of the measures taken to minimize and/or control emissions during the event.

(f) Corrective Actions:

Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.

(g) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?

☐ YES ☐ NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

☐ YES ☐ NO

Section 2. Other Permit Deviations

(a) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

(b) Permit Condition Deviation:

Identify each permit condition deviation or potential deviation. Attach additional sheets as necessary.

Permit Condition	Potential Deviation
_____	_____
_____	_____
_____	_____

(c) Corrective Actions:

Attach a description of actions taken to correct the deviation or potential deviation and to prevent recurrence.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name:

Signature:

Date:

Alaska Department of Environmental Conservation

Air Permits Program

August 4, 2003

Yukon-Kuskokwim Health Corporation

Yukon-Kuskokwim Delta Regional Hospital

STATEMENT OF BASIS

of the terms and conditions for

Permit No. 737TVP01

June 18, 2003

Prepared by Randall E. Lucas



INTRODUCTION

This document sets forth the legal and factual basis for the terms and conditions of Operating Permit No. 737TVP01.

FACILITY IDENTIFICATION

Section 1 of Operating Permit No. 737TVP01 contains information on the facility as provided in the Title V permit application.

The Yukon-Kuskokwim Delta Regional Hospital consists of a hospital, a convent and associated medical offices for private and hospital health care professionals. The facility is owned and operated by Yukon Kuskokwim Health Corporation (YKHC), and is the Permittee for the facility's operating permit.

The SIC code for this facility is 8062.

SOURCE INVENTORY AND DESCRIPTION

Table 1 of Operating Permit No. 737TVP01 contains information on the sources regulated by this permit as provided in the application. The table is provided for informational and identification purposes only. Specifically, the source rating/size provided in the table is not intended to create an enforceable limit.

EMISSIONS

Section 2 of Operating Permit No. 737TVP01 contains emission information as provided in the Title V application. A summary of the potential to emit (PTE)¹ and PTE from Source ID 9 (HMIWI) as indicated in the application from the YKHC and is shown in the table below.

Table A - Emissions Summary, in Tons Per Year (TPY)


Pollutant	NO _x	CO	PM-10	SO ₂	VOC	HAPs	Total
PTE	81	19	0	76	0	0	182
PTE HMIWI Source ID 9	61	17	3	12	2	0	90

¹ *Potential to Emit or PTE* means the maximum quantity of a release of an air contaminant, considering a facility's physical or operational design, based on continual operation of all sources within the facility for 24 hours a day, 365 days a year, reduced by the effect of pollution control equipment and approved state or federal limitations on the capacity of the facility's sources or the facility to emit an air contaminant, including limitations such as restrictions on hours or rates of operation and type or amount of material combusted, stored, or processed as defined in AS 46.14.990(21), effective 1/18/97.

The assessable PTE listed under condition 1.1 is the sum of the emissions of each individual regulated air contaminant from Source ID 9 (subject to 40 CFR 62 Subpart HHH) for which the facility has the potential to emit quantities greater than 10 TPY. Note 4 of 18 AAC 50.346(a)(1) states that for facilities that only need an operating permit because they have source(s) subject to EPA's 40 CFR 62 only the emissions from the source(s) subject to the 40 CFR 62 emission standards are counted as assessable emissions." The emissions listed in Table A are estimates for informational use only. The listing of the emissions does not create an enforceable limit to the facility.

The emissions for diesel fuel fired equipment were calculated based on the owner-requested limit of 1,500 hours per year for each of Source ID(s) 6 through 8, and 12. This limit was requested to reduce emissions below the threshold of 100 tpy of a single regulated air contaminant. For criteria pollutants, emissions are as provided in the application.

BASIS FOR REQUIRING AN OPERATING PERMIT

This facility requires an operating permit under AS 46.14.130(b)(4)(A) because it contains a source subject to 40 CFR 62 Subpart HHH, adopted by reference in 18 AAC 50.040(g). The facility also requires a permit because the facility has sources that are insignificant, based on actual emissions (18 AAC 50.335(r)). The permit does not address the 50.055 requirements (already removed) but rather those insignificant sources under 50.335(r) that may become significant. 

Yukon-Kuskokwim Health Corporation requested operational limits for the Yukon-Kuskokwim Delta Regional Hospital under 18 AAC 50.335(g) to avoid classification under 18 AAC 50.325(b)(1). Without the limits, the facility could emit more than 100 tpy of a regulated air contaminant.

Alaska regulations require operating permit applications to include identification of "regulated sources." As applied to Yukon-Kuskokwim Delta Regional Hospital, the State regulations require a description of:

- ⇒ Each source subject to a standard adopted by reference in 18 AAC 50.040 under 18 AAC 50.335(e)(2).
- ⇒ Any source subject to an operation restriction applied for under 18 AAC 50.335(g) to be a "regulated source." Each of the sources that are insignificant is based on actual emissions as per 18 AAC 50.335(r).

The emission sources at Yukon-Kuskokwim Delta Regional Hospital are classified as "regulated sources" according to the above department regulations are listed in Table 1 of Operating Permit No. 737TVP01.

CURRENT AIR QUALITY PERMITS

Previous Air Quality Permit to Operate

No previous air quality control permit-to-operate exists for this facility.

Construction Permits

No construction permits have been issued for this facility after January 18, 1997 (the effective date of the new divided operating and construction-permitting program).

Title V Operating Permit Application History

Because YKHC Hospital has a medical waste incinerator the owner or operator was required to submit to the US Environmental Protection Agency (EPA) requirements of the 40 CFR 62 Subpart HHH, and to the DEC, a Title V Operating Permit application. On December 12, 2001 YKHC submitted the 40 CFR 62 Subpart HHH requirement to EPA. On February 28, 2002 YKHC submitted their Title V Operating Permit application.

COMPLIANCE HISTORY

The facility has operated at its current location since 1980. The YKHC did not submit a Title V permit application prior to the 1997 Title V required date, because YKHC did not believe the YKHC facility met the Department's requirement for a permit.

As early as 1983, YKHC was a Prevention of Significant Deterioration (PSD) source, classified under ADEC's construction permit program. As of the original installation of the major sources (not considering insignificant sources) in 1979, the facility had to PTE of 252 tpy of NO_x. YKHC became an 18 AAC 50.300(c)(1) classified facility as of the modifications/installation of the incinerator in 1995. The facility added additional sources in 1998 that would have triggered the facility to obtain a PSD construction permit. The 1998 modification increased the PTE, which exceeded the PSD permitting threshold as required in 18 AAC 50.300(h)(3)(B)(ii).

On August 15, 2000, EPA established the 40 CFR 62 Subpart HHH requirements for medical waste incinerators, which also require a facility to obtain a Title V, permit. The Department notified YKHC to submit the requirements for 40 CFR 62 Subpart HHH and a Title V Permit application. The Title V permit application was submitted to the Department on February 28, 2002.

STATEMENT OF BASIS FOR THE PERMIT CONDITIONS

The state and federal regulations for each condition are cited in Operating Permit No. 737TVP01.

Conditions 1 - 2 - Assessable Emission Fees

Applicability: The regulations require all permits to include due dates for the payment of fees and any method the Permittee may use to re-compute assessable emissions.

Factual Basis: These standard conditions require the Permittee to pay fees in accordance with the Department's billing regulations. The billing regulations set the due dates for payment of fees based on the billing date.

The default assessable emissions are emissions of each air contaminant authorized by the permit (AS 46.14.250(h)(1)(A)). Air contaminant means any regulated air contaminant and any hazardous air contaminant. Therefore, assessable emissions under AS 46.14.250(h)(1)(A) mean the **potential** to emit any air contaminant identified in the permit, including those not specifically limited by the permit. For example, hydrogen chloride (HCl) emissions from an incinerator are assessable emissions because they are a hazardous air contaminant, even if there is currently no emission limit on HCl for that class of incinerator.

The conditions also describe how the Permittee may calculate **actual** annual assessable emissions based on previous actual annual emissions. According to AS 46.14.250(h)(1)(B), assessable emissions are based on each air contaminant. Therefore, fees based on actual emissions must also be paid on any contaminant emitted whether or not the permit contains any limitation of that contaminant.

This standard condition specifies that, unless otherwise approved by the Department, calculations of assessable emission based on actual emissions use the most recent previous calendar year's emissions. Since each current year's assessable emission are based on the previous year, the Department will not give refunds or make additional billings at the end of the current year if the estimated emissions and current year actual emissions do not match. The Permittee will normally pay for actual emissions - just with a one-year time lag.

Projected actual emissions may differ from the previous year's actual emissions if there is a change at the facility, such as changes in equipment or an emission rate from existing equipment.

If the Permittee does not choose to annually calculate assessable emissions, emissions fees will be based on "potential to emit" (PTE).

The PTE set forth in the condition is based on liquid fuel with a sulfur content of 0.5 percent by weight or fuel gas with a sulfur content of 60 ppm H₂S by volume. If the actual sulfur content of the fuel is greater than these assumptions, the assessable emissions calculations provided by the Permittee should reflect the actual sulfur content. The change in these values may result in SO₂ emissions that could trigger PSD.

Condition 3 – 40 CFR 62 Subpart HHH Modifications.

Applicability: This condition states that all requirements pertaining to Modifications contained in 40 CFR 62.14403 through 14490, Subpart HHH and 40 CFR 60.50c, Subpart Ec are applicable to Source ID 9.

Factual Basis: 40 CFR 62 Subpart HHH contains the specific requirements applicable to all affected facilities (sources) subject to small rural Medical Waste Incinerators.

Condition 4 - 40 CFR 62 Subpart HHH Emission Limits Requirements

Applicability: This condition states that all requirements pertaining to Emission Limits Requirements contained in 40 CFR 62.14413, 40 CFR 62.14411 & Table 1, 40 CFR 62.14412, Subpart HHH are applicable to Source ID 9.

Factual Basis: 40 CFR 62 Subpart HHH contains the specific requirements applicable to all affected facilities (sources) subject to small rural Medical Waste Incinerators.

Condition 5 - 40 CFR 62 Subpart HHH Waste Management Plan

Applicability: This condition states that all requirements pertaining to the Waste Management Plan contained in 40 C.F.R. 62.14431, Subpart HHH are applicable to Source ID 9.

Factual Basis: 40 CFR 62 Subpart HHH contains the specific requirements applicable to all affected facilities (sources) subject to small rural Medical Waste Incinerators.

Condition 6 - 40 CFR 62 Subpart HHH Operator Training and Qualification

Applicability: This condition states that all requirements pertaining to the Operator Training and Qualification contained in 40 C.F.R. 62.14420 through 62.14423, Subpart HHH are applicable to Source ID 9.

Factual Basis: 40 CFR 62 Subpart HHH contains the specific requirements applicable to all affected facilities (sources) subject to small rural Medical Waste Incinerators.

Condition 7 - 40 CFR 62 Subpart HHH Documentation

Applicability: This condition states that all requirements contained in 40 C.F.R. 62.14424 and 62.14425, Subpart HHH, pertaining to Documentation including the above mentioned training records, are applicable to Source ID 9.

Factual Basis: 40 CFR 62 Subpart HHH contains the specific requirements applicable to all affected facilities (sources) subject to small rural Medical Waste Incinerators.

Condition 8 - 40 CFR 62 Subpart HHH Inspection Requirements

Applicability: This condition states that all requirements contained in 40 C.F.R. 62.14441 through 62.14443, Subpart HHH, pertaining to Inspection Requirements, are applicable to Source ID 9.

Factual Basis: 40 CFR 62 Subpart HHH contains the specific requirements applicable to all affected facilities (sources) subject to small rural Medical Waste Incinerators.

Condition 9 - 40 CFR 62 Subpart HHH Performance Testing and Monitoring Requirements

Applicability: This condition states that all requirements contained in 40 C.F.R. 62.14450, 62.14452, 62.14453 and Table 3, Subpart HHH, pertaining Inspection Requirements, are applicable to Source ID 9.

Factual Basis: 40 CFR 62 Subpart HHH contains the specific requirements applicable to all affected facilities (sources) subject to small rural Medical Waste Incinerators.

Condition 10 – Owner Requested Operating Limits

Applicability: The Permittee has requested operating limits for Source ID's 6 through 8, and 12 to avoid classification as a facility that has the potential to emit 100 tpy of a regulated air contaminant to assure that the facility not be classified as a "Major Facility.

Factual Basis: The Permittee has requested operating limits from industrial processes and fuel burning equipment standards that include monitoring recordkeeping and reporting requirements.

Condition 11 – Federal Plan Owner Requested Limits - To retain status for Source ID 9, as a small rural Hospital Medical and Infectious Waste Incinerators (HMIWI).

Applicability: The Permittee has requested operating limits for the amount of hospital waste and medical infectious waste incinerated in Source ID 9 from EPA to retain classification as a small rural incinerator

Factual Basis: The Permittee is required to follow 40 CFR 62 Subpart HHH Federal plan Requirements for small rural HMIWI's.

Condition 12 - Insignificant Sources

Applicability: These general emission standards apply to all industrial processes fuel-burning equipment, and incinerators regardless of size.

Factual Basis: The conditions re-iterate the general standards and require compliance for insignificant sources. The Permittee may not cause or allow their equipment to violate these standards. Insignificant sources are not listed in the permit unless specific monitoring, recordkeeping and reporting are necessary to ensure compliance. Insignificant sources are based on actual emissions. The permit does not address the 18 AAC 50.055 requirements (already removed) but rather those insignificant sources under 18 AAC 50.335(r) that may become significant.

Condition 12 also requires certification that the sources did not exceed state emission standards during the previous year and did not emit any prohibited air pollution.

Condition 13 - Refrigerant Recycling and Disposal

Applicability: Applies if the Permittee engages in the recycling or disposal of certain refrigerants.

Factual Basis: The condition requires the Permittee to comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F, that will

apply if the Permittee uses certain refrigerants. Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with this federal regulation.

Condition 14 - Permit Renewal

Applicability: Applies if the Permittee intends to renew the permit.

Factual Basis: The Permittee is required to submit an application for permit renewal by the specific dates applicable to the Yukon-Kuskokwim Delta Regional Hospital as listed in this condition. Monitoring, recordkeeping, and reporting for this condition consist of the application submittal.

Condition 15 - Certification

Applicability: This is a standard condition to be included in all permits. Applies because every permit requires the Permittee to submit reports.

Factual Basis: This condition requires the Permittee to certify all reports submitted to the Department. To ease the certification burden on the Permittee, the condition allows the excess emission reports to be **certified** with the facility report, even though it must still be **submitted** more frequently than the facility operating report. This condition supplements the reporting requirements of this permit.

Condition 16 - Submittals

Applicability: Applies because the Permittee is required to send reports to the Department.

Factual Basis: This condition requires the Permittee to send submittals to the address specified in this condition. Receipt of the submittal at the correct Department office is sufficient monitoring for this condition. This condition supplements the reporting requirements of this permit.

Condition 17 - Information Requests

Applicability: Applies to all Permittees and incorporates a standard condition.

Factual Basis: This condition incorporates a standard condition in regulation, which requires the Permittee to submit information requested by the Department. Monitoring consists of receipt of the requested information.

Condition 18 - Recordkeeping Requirements

Applicability: Applies because the Permittee is required by the permit to keep records.

Factual Basis: The condition restates the regulatory requirements for recordkeeping, and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide an evidence of compliance with this requirement.

Condition 19 - Excess Emission and Permit Deviation Reports

Applicability: Applies when the emissions or operations deviate from the requirements of the permit. These requirements remain in the permit because of the facility insignificant sources.

Factual Basis: This condition satisfies two state regulations related to excess emissions - the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The reports themselves and the other monitoring records required under this permit provide monitoring of whether the Permittee has complied with the condition. Please note that there may be additional federally required excess emission reporting requirements.

Condition 20 - Operating Reports

Applicability: Applies to all permits, specifically in this permit because of the insignificant sources.

Factual Basis: The condition restates the requirements for reports listed in regulation. The condition supplements the specific reporting requirements elsewhere in the permit. The reports themselves provide monitoring for compliance with this condition.

Condition 21 - Annual Compliance Certification

Applicability: Applies to all Permittees.

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification. The reports themselves provide monitoring for compliance with this condition.

Conditions 22 - 28 - Standard Conditions

Applicability: Applies because these are standard conditions to be included in all permits.

Factual Basis: These are standard conditions required for all operating permits.